

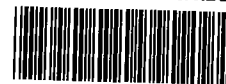
From: Allen A. Debus, IL/IN/MI Section

To: Greg Rudloff, IL/IN/MI Section

Subject: Review of Detroit Coke QAPP

Date: July 17, 1997

US EPA RECORDS CENTER REGION 5



1005149

I have the following comments concerning the QAPP referenced above. In conducting this review, I have factored in our discussions pertaining to your general level of satisfaction with how project objectives have been addressed in this plan. You do seem comfortable with the selection of State based industrial health standards, and the fact that these "action levels" are not actually stated in the QAPP. (Apparently as we discussed you have already compared the proposed reporting limits with the State based standards and found that they do compare favorably.) Also, although the proposed target parameter list is broad you have independently indicated which compounds are likely to be of most environmental concern. It is your list of compounds which shall "drive" my review of Trimatrix's reported performance evaluation data. Finally, you are willing to accept the PID field and "expedited lab" approach to generating screening data that will be relied on in establishing the final target list (even though it is not designed to analytically capture all of the contaminants on the target list since the PID's sensitivity is limited to certain VOCs compounds). My review of analytical procedures was limited due to the fact that I have reviewed previous versions of these SOPs when they were owned by Earth Tech, and also because PE sample results will ultimately determine whether the SOPs can be used to generate reliable and accurate data. (Concerns from my review of Earth Tech SOPs seem to have been addressed in the Trimatrix SOPs.)

Specific Comments:

1. Section 1, page 2 of 14: The term, "perimeter approach" used in the fourth paragraph should perhaps be changed to "solid waste management area" (SWMAs) to alleviate confusion.
2. Section 1.4.1, page 8 of 14: Note that the PID will be of no utility in detecting non-VOC contamination.
3. Section 1.4.1, page 9 of 14: The means of preserving VOCs samples in soil must be discussed. There are several ways to accomplish this. However, the procedure must be fully explained. If the preservation technique will impact the subsequent analytical strategy, then this should also be stated with an understanding as to whether or not specific project objectives may or may not be ultimately fulfilled (i.e. detection limits, accuracy & precision criteria, blank acceptance criteria, etc...). Note that the low concentration VOCs in soil method relying on purge & trap, is no longer considered an acceptable analytical strategy by the U.S. EPA as it has been deleted from SW-886, as of

June 13, 1997.

4. Section 1.4.3, page 11 of 14: This section presents DQOs using the old style "Superfund Levels 1 through 5" terminology. This is unacceptable today. However, because they have indicated the level of QC documentation intended for final data packages associated with the "confirmatory" data as well as the "expedited data", (as well as field data), perhaps we can simply ask for some revisions where warranted. Detroit Coke should add details concerning which levels of QC (i.e. QC sample types and procedures) will NOT be performed in the case of "expedited data". It is generally understood that the "confirmation data" to be provided for the final target parameter list will consist of a CLP-like data deliverable package.
5. Section 3.3.3, page 3 of 5: Rephrase the first sentence to read, "Lab completeness is a measure of the amount of valid measurements obtained from all the measurements planned for the project."
6. Sections 4.2.2.1 and 4.2.2.2, page 2 of 5: What is the anticipated source of water to be used for the final rinse? (How "clean" will it be?) Note that the frequencies cited for the rinse blanks and field duplicate samples applies to each parameter group. This information should be inserted into these respective sections.
7. Section 4.2.2.4, page 3 of 3: For organic constituents, organic free reagent water, or HPLC grade water should be used.
8. Section 5.1.3, page 4 of 5: Will co-located samples be collected? This procedure should be decided in advance, and if this will be the case, the procedure for co-locating samples should be provided.
9. Section 5.3, page 5 of 5: What will the final evidence file specifically be comprised of? What is the retention period for the evidence file? It should be stated that these files should be offered to the U.S. EPA prior to disposal.
10. Section 7.2.2, page 2 of 2: Some of the constituents which appear on the facility target list such as acetonitrile and acrylonitrile are poor purging, relatively toxic compounds. Unless the matrix spike solution is fortified with such compounds as a further demonstration of method accuracy, "non-detect" data may not be accepted as indication of the "absence" of such compounds.
11. Section 8.2.1, page 1 of 3: This section should instead refer to all the relevant sections from each respective method that has been proposed. In this case, in the interest of streamlining, it may not be necessary to ask for modifications.
12. Section 9.2.2, page 3 of 4: Referring to the final paragraph in this section, it should be stated that decisions to repeat sample collection will not take place without the advisement and approval of the U.S. project coordinator.

19. Table 7-2: The allowable holding time until sample extraction for SVOCs should be added to this table.
20. Table 7-3: Note that among other compounds, relatively toxic acetonitrile and acrylonitrile will not purge efficiently and most likely will be undetected unless present in high concentrations. The relevant State of Michigan action limits have not been included in the QAPP, but should ordinarily be indicated in this table. Apparently, the compounds, 2-chloro-1,3-butadiene and trans-1,4-dichloro-2-butene were not included in the proposed 8260 founded SOP. Standards for initial and continuing calibration should be included in the analytical procedure. Criteria for quantitation should be incorporated into the QAPP. Also, these compounds should be assigned to an internal standard. It is apparent that both SOP standards 1A and 1B will be utilized in order to address each of the compounds included in Table 7-3.
21. Table 7-3: The compound, diphenylamine, was apparently not included in the SVOC SOP. Standards allowing for its initial and continuing calibration as well as criteria for quantitation should be incorporated into this QAPP. Although 3 and 4 methylphenol are indicated as separate parameters in this table, note that they will be reported as a sum. The QAPP table should be modified accordingly.
22. Table 8-1: With reference to section 11.5 of the SVOC SOP, it should be adequately clarified that the matrix spiking compounds will be spiked into the sample matrix, not the sample extract.
23. Table 8-2: Surrogate compounds should be spiked into the sample matrices. (See section 11.4 of the SVOCs SOP.)
24. Field Sampling Plan, page 6 of 11: Referring to the first bullet, bailers are not recommended for collecting VOCs samples.
25. Field Sampling Plan, page 7 of 11: A number of questions should be addressed. How will soil samples be preserved? Which samples and parameter groups shall be taken first, and what is the order of sampling until the last sample is taken? Referring to the second paragraph, it seems as if the "completeness DQO" will only be 25% for soil samples, in contrast to what is stated in section 3 of the QAPP where it is indicated that a completeness greater than 90% will be achieved. Under what conditions will soil samples be selected for analysis (i.e. on the outcome of a positive "detect" based on the expedited sample, or a negative result, and at which decision level for each respective parameter)? Which project objectives are associated with the selection?
26. Field Sampling Plan, page 8 of 11: To what depth will samples be taken? What criteria will define the sampling depth and depth interval? Referring to "Field Screening", under what circumstances will the lab fraction actually be analyzed? Note that the "expedited lab analysis" should count as "field screening" per a recent U.S. EPA memorandum.

27. Field Sampling Plan, page 10 of 11: Dissolved oxygen and turbidity should also be included as indicators of groundwater stabilization. Will both 3 well volumes and stabilization criteria be applied prior to allowing sample collection? Note that a 10% range between successive pH measurements is excessive and favors uncertainty with basic water samples relative to acid samples. It is recommended that the criteria cited in a recent U.S. EPA groundwater sampling guidance memorandum be relied on as a guideline instead for all groundwater field analytical parameters.
28. Table 4-1: The holding time until SVOC sample extraction should be indicated in this table.
29. 8260 SOP, Appendix A, section 13.3.1.2: What is the prescribed corrective action?

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: February 10, 1995

SUBJECT: Review of Detroit Coke's First QAPP Revision
U.S. EPA I.D. # MID099114704

FROM: Allen A. Debus, IL/MN/WI Section 

TO: Greg Rudloff, MI Section

I believe you may conditionally approve the QAPP for the facility referenced above. Detroit Coke ignored several of our comments, including the large issue concerning effective coupling of the SOPs with the QAPP, a matter which has taken on greater significance here in Region 5 lately. For its intended purposes, however (a release assessment screen), this added uniformity of style may not significantly increase the possibility of achieving more reliable data. When the RFI is under review such attention to details of the SOPs will be of greater importance.

My comments are outlined below. You may judge which of these should be incorporated into terms of a conditional approval.

1. Only 4 volatile organic compounds have been proposed, as reflected in the project management plan, and sections of the QAPP addressing target parameters. This is the case even though the U.S. EPA requested either additional "method 8240" compounds, or further rationale for why additional parameters are not needed for the RA. (Interestingly, there are more spiking compounds, (a total of 5 used in MS/MSD samples, plus 3 surrogates) than the 4 BTEX parameters proposed for investigational analysis using method 8240.)
2. It appears as if Detroit Coke is setting conditions for further investigation which may not be entirely appropriate at this time, depending on the nature of perceived project objectives. See section 2.3.2 of the project management plan, page 16 of 24, first sentence of the second paragraph in this section. Also see page 17 of 24, section 2.3.2, last sentence under "Laboratory". *not OK. if soil contaminated → GW samp.*
3. Minor point - on the QAPP's title page, "Detroit" is spelled incorrectly under signature blank for Paul Choinski.
4. Referring to section 1.4.3 of the QAPP, as of the Fall, 1994, Superfund terminated usage of the 5 DQO levels. This discussion is no longer relevant, and may be entirely deleted. (Other discussion pertaining to how target analytical levels and/or other specific objectives would be met for all sampling events should be substituted here. This time, however, let's not expect major changes. However, this style of presentation will not be permitted in the forthcoming RFI QAPP.)
mention, but don't require change

5. Referring to page 5 of 5 in section 3.6 of the QAPP, the field duplicate frequency should be 1 per 10 investigational samples, (per sample matrix). The rinse blank frequency as they have defined it should also be 1 per 10 investigational samples. Sample network tables should be modified to reflect these changes. (See Table 6-1 of the Field Sampling Plan, and Table 1-1 in the QAPP.) Furthermore, the reference to the "field duplicate blank", found on this page, (first full paragraph) should perhaps be changed to "field duplicate".
6. Referring to section 4.2.2.1 of the QAPP, the equipment rinse blank sample collection frequency should be changed to one for every 10 or fewer investigative samples.
7. In Table 1-1, for purposes of clarity, the term "8270 PNAs" should indicate that only compounds marked by a single asterisk in Table 7-3 will be measured and reported when referred to in this fashion. (See column entitled, "Laboratory Analysis" in Table 1-1.)
8. Comment #45 from the U.S. EPA's notice of deficiency letter was not fully addressed. Columns reflecting the "target levels" which must be attained in order to successfully utilize data for an intended purpose should be added to Table 7-3, not simply referenced. For any constituent(s) having intended reporting limits in excess of the "target analytical limit(s)", (for respective constituents in respective media), rationale should be provided for why such a circumstance would not cause difficulties during the subsequent data assessment phase.
9. There appear to be typographical errors in the references to preventive maintenance procedures for the photoionization detector included in Table 11-1.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: October 18, 1994

SUBJECT: Screen Review of Draft QAPP for Detroit Coke' Release Assessment;
MID099114704

FROM: Allen A. Debus, RPB QAPP Coordinator

AD

TO: Greg Rudloff, MI Section

Per your request, I have screened the QAPP mentioned above. My comments are indicated on the attachment. After review, please disseminate these concerns to the Detroit Coke representative at the earliest opportunity. It may also be worthwhile to discuss the issues at a conference call or meeting. If you have any further questions or comments, please do not hesitate to contact me at 6-6186. This file is accessible via the LAN at f:\user\share\rudloff*.*, file name "Detroit.1".

cc: George Schupp, QAS
Dennis Wesolowski, CASS

COMMENTS CONCERNING DRAFT QAPP FOR DETROIT COKE OF

DETROIT, MICHIGAN; MID099114704

I. Project Management Plan:

1. p. 12 of 21, last paragraph; Is it thought that background samples will also reflect presence of analytical interferences possibly attributable to presence of coal fines and air deposition products?
2. Section 2.3.1; Here and throughout the QAPP and RA Workplan, the term, "obvious impact" must be clearly defined procedurally and, to the greatest extent possible, in quantitative terms.
3. page 15 of 21, section 2.3.2; The term, "presence or absence", must be clearly and quantitatively defined. Will this determination be made regardless of whether groundwater samples are collected near SWMUs? Has a "hot spot" screening strategy been designed for the RA?
4. page 17 of 21, section 2.4.2; Although it is stated that 8 soil locations have been selected, apparently, 9 soil background sampling locations are indicated in Figure 2.2.
5. Section 2.4.2; There should be at least 4 background (soil) samples, representing each distinct soil horizon. Of what purpose will soil background data be during data assessment? Will this data be statistically evaluated and compared to other investigational areas without consideration of other "action" or health-based criteria?
6. page 19 of 21, section 2.4.4; There are apparent contradictions concerning the references to "obvious impact". In one possible instance, when field screening results do not indicate obvious impact, 20% to 30% groundwater and/or samples will be submitted to the laboratory. In another hypothetical instance, if no obvious impact is evident, 50% groundwater and/or soil samples will be submitted to the laboratory. Was it intended to refer to "obvious impact", instead of "no obvious impact", in the latter instance?

II. Field Sampling Plan:

1. Section 6.0; Does this soil sampling procedure adequately reflect the purpose of the sampling event? (e.g. "hot spot" screening to define "release", versus efforts to define the horizontal and vertical extent of contamination near the limits of risk based, low concentration levels) The procedure proposed for soil sampling, through use of a split spoon sampling device, will not minimize loss of VOCs during soil sampling. Is this circumstance a matter of concern given the nature of the project objectives, (once they become more clearly expressed in a revision to this QAPP.)

2. Section 6.3.1; Should further testing be required to determine whether drill cuttings pass the TCLP criteria?
3. Section 6.3.2; Groundwater turbidity, and dissolved oxygen content should be measured during the well purging procedure as a means of indicating groundwater "stabilization", prior to sampling. (See page 127 of SW-846, Chapter 11, 3rd edition, October, 1991.)
4. Section 6.3.2; Bailers should not be used to sample VOCs. Detroit Coke should propose an alternate procedure which will minimize loss of VOCs to the atmosphere, unless excessive losses will not adversely impact Detroit Coke's capability to attain pertinent project objectives.
5. Table 6-1 should be revised per the comments provided concerning the analogous table appended to the QAPP.

III. QAPP

1. The title page of the QAPP requires a signatory space for the designated Detroit Coke representative.
2. Referring to page 5 of 10 in section 1.4, there is indication that PNAs will be analyzed in background samples. Although left unstated, it is presumed that the purpose will be to either identify the concentrations of PNAs which are either naturally occurring, or which have resulted from the site's operational history, although unaffected by discrete SWMUs. The purpose of the basis for collecting PNAs samples in background locations should be stated more specifically.
3. On page 6 of 10 in section 1.4, the term "obvious release" must be defined procedurally and quantitatively with respect to soil sampling that is planned. Also, how will the "most impacted" areas be discerned when no obvious impact is observed?
4. The rationale for why there are so few VOCs constituents included in the facility target parameter list should be fortified. Conversely, the list of VOCs should be increased to include all of the hazardous constituents indicated in Table 1A of the "8240SOP" found in Appendix A, because this is the list of constituents for which the method has been validated for.
5. Although it is indicated in the PMP, pages 13 to 14 of 21, that metals and cyanide will not be included on the facility target parameter list, it is evident that Detroit Coke would anticipate finding widespread metals and cyanide contamination, possibly even in areas tentatively proposed as "background", due to the emission of scattered coal dust fines. In section 1.4.2.2, several organic laboratory parameters are proposed for the RA. However, if no organics are detected in certain areas, or if organics are found not to be in association with SWMUs, then does the possibility that metals/cyanide contamination will be left unaddressed in any future RFI studies that are planned present adverse

environmental concerns?

6. Referring to section 1.5 of the QAPP, will it be possible to import the groundwater data that is generated in DMS format into GRITS format?
7. The discussion of duties for the Earth-Tech RA Project and Technical Managers is rather noninformative. Would it be possible to identify or speculate further on the possible range of duties for these individuals, instead of simply stating that a number of their duties will be directly delegated by the Detroit Coke RA Manager?
8. Referring to section 2.4 of the QAPP, who will be responsible for performing independent data validation?
9. The laboratory address(es) to which samples will be shipped during the RA should be stated in section 2 of the QAPP.
10. Referring to section 3.5 of the QAPP, will data generated during the RA be comparable to data generated during the RFI?
11. Referring to page 5 of 6 in section 3.6, Table 1-1 indicates a 1/20 frequency for field blanks. The 1/10 ratio specified in the second paragraph on this page for the equipment rinse blank is actually preferred.
12. Referring to section 4.2.1, the specific use of the referenced document should be tailored to specific constituents of concern for this project and target levels which should not be exceeded for PNAs, BTEX, and BNAs in order to meet pertinent project objectives.
13. The set of potential corrective actions briefly described in section 4.2.1 should be moved to section 13 of the QAPP.
14. In section 4.2.2, how are field blanks and equipment rinse blanks respectively defined and what are the frequencies of collection.
15. Referring to section 5.2, how are sample extracts, (e.g. BNAs and PNAs) handled under laboratory chain of custody?
16. In Table 6-1, it is stated that CCV will be <25%, as performed every 12 hours. On page 2 of 2 in section 6.0, the criteria is within plus or minus 15%, as performed every 10 samples. Then, the ICV criteria is 20% D. Please clarify the relationships between the 3 criteria, and as they will be addressed procedurally.
17. In section 7.2.2, it is stated that "no specific compounds have been identified as chemicals of concern". However, specific compounds of concern are identified in the target parameter list. Therefore, the matrix spiking solutions could and perhaps should be customized to the extent possible such that data of known quality and optimal reliability can be generated for this project.
18. Referring to section 9.2 of the QAPP, independent data validation should also be performed at a 100% frequency.

19. There is a reference to a section 2.12 in section 9.2.2, page 3 of 4, of the QAPP. However, it is unclear which document this section 2.12 is contained in.
20. On page 4 of 4 in section 9.3 of the QAPP, there are references to calibration verification of blanks. However, procedures for initial and continuing calibration, which are discussed procedurally in the SOPs contained in Appendix A, should also be itemized. Blank data results should also be part of the final report (i.e. not just "calibration verification of standards and blanks"). It should be mentioned under section 9.3 that the final data deliverables should be in a "CLP-like" deliverables format.
21. Under section 10.2.2.3, inspection of "typical" data deliverables packages should also be included.
22. Preventative maintenance items, mentioned in section 11.1, for field activities should be tabulated.
23. Although in section 13.0, it is mentioned that an individual in the U.S. EPA's QAS will be notified, actually, initial contact should first be made with Greg Rudloff.
24. Given that the number and types of samples to be taken, as proposed in the RA plan has not been definitively established, the statement introducing section 13.1 loses significance. An effort should be made to decide exactly how many samples shall be taken, and then modify the procedure via the corrective action mechanism if modifications become necessary.
25. Section 13.2 in the QAPP should refer to some specific circumstances which may have the effect of triggering corrective action. For example, see sections 6.6.3, 6.6.5 and 6.3 of method "8270SOP", and section 8.1.2.1 of "8240SOP", and, for the latter method, situations when the %D criteria for CCC response factors are exceeded for the daily calibration check.
26. Referring to section 13.3 of the QAPP, another laboratory may not be used without written approval of the U.S.EPA. (Switching laboratories for any purpose may not be engineered through a simple corrective action procedure.)
27. Referring to Table 1-1, references to "8270 (BNAs plus pyridine)" and "8270 (PNAs)" seem incongruous because PNAs are classified as "base/neutrals". In the "MS/MSD", "Duplicates", and "Field Blanks" columns, the actual number of samples should be stated, not simply the frequency of collection. Ranges of samples should not be indicated in the "Investigative Samples" column, a matter which may have to be reconciled with page 19 of 21 in the PMP. (Also see comment III.24 above.) The depths at which samples shall be taken should be reflected in Table 1-1. It is not entirely clear why there are 2 rows for SWMUs 1 through 8 in both the "Matrix" and "Field Parameters" columns. Is it intended to take samples for VOA analyses if background areas are "obviously contaminated"?

28. In Table 6-1, for initial calibration, the % RSD should be < 30% for calibration check compounds, (and, for both methods 8240SOP and 8270SOP, all target analytes should be included in the 5 standards).
29. In Table 6-1, under the "Method Reference" column, which method, 8240 or 8260, will be used? Actually, the method reference should directly identify names of the SOPs proposed for use.
30. For internal standards, the retention times should be within plus or minus 30 seconds from the previous calibration and their area must be - 50% to + 100%. (e.g. see section 9.4 of the "8270SOP".) Other similar and analogous qualitative identification criteria also exist for the volatiles to be determined by the "8240SOP". Such criteria should be added to Table 6-1, possibly in the form of footnotes.
31. Referring to Table 7-1, method selection should be deferred until after the target criteria (e.g. Act 307 criteria) have been fully established. Given the potential for encountering widespread contamination and resulting analytical interferences, it may be difficult to achieve sensitivities for this RA near health based limits for groundwater for certain target analytes.
32. Although two extraction procedures have been identified in Table 7-1 for the soil and water matrices respectively, it may be absolutely necessary to employ more rigorous cleanup procedures, given that the site could be extensively contaminated both with coal dust fines as well as ample amounts of TPH. For instance, it may be necessary to perform gel permeation chromatography on soil samples prior to analysis. Once the project objectives have been more rigorously defined, it should be possible to evaluate the extent to which sample cleanup must be performed to remove analytical interferences in samples to be analyzed for PNAs and BNAs.
33. Table 7-1 does not reflect analytical procedures to be performed in the field. It may be necessary to consider the addition of field tests to supplement the performance of any field headspace tests performed on soil samples to more reliably characterize the sources of "obvious contamination". However, this strategy must be reconciled and coupled with the nature of the overall project objectives.
34. Referring to Table 7-3, the method detection limits based on a 5 mL purge for the groundwater matrix may be insufficiently high for certain target parameters if the project purposes include comparison to health based values. Also, until a more effective rationale is presented, the list of 4 VOCs must be regarded as noncomprehensive. After all, it is possible to analyze many other VOCs using the "8240SOP".
35. An unresolved issue concerns how the proposed reporting limits found in Table 7-3 compare to the target levels that are required for this project? Table 7-3 must be supplemented with two additional columns comparing these target limits with the proposed reporting limits for all media to be sampled. For all instances where an Act 307 or other relevant limit cannot be attained, there must be rationale presented for why it may not be necessary (or even impossible) to achieve the target

limit.

36. It is unclear why data for all semivolatile constituents found in Table 7-3 won't be reported for all 4 SWMUs. Method "8270SOP" is capable of being used for all the semivolatile constituents found in Table 7-3.
37. Method "8270SOP" provides relatively high reporting limits for pentachlorophenol in groundwater. However, there are other methods that will allow analysis of this constituent to lower levels more comparable with the human health 1/1,000,000 risk of 0.7 ppb. The rationale for why certain target levels may or may not be achieved must be explored further. (Also see comment III.35 above.)
38. Why is the compound, fluorene, listed twice in Table 7-3?
39. Referring to Table 8-1, please clarify why the stated criteria differ slightly from the "windows" expressed in Table 7 of 8270SOP? Also, are the values expressed in the "Precision" column intended to be in RPD? What does footnote (1) refer to? Why doesn't the criteria for VOCs match that provided in Tables 11 and 12 of 8240SOP more closely?
40. In Table 8-2, the ranges seem rather low for 8240 surrogates. Also, what is the rationale for not using 1,2 dichloroethane as an 8240SOP surrogate? Table 10 of method 8240SOP should be referenced in this table. Why is it that surrogates for semivolatiles do not exactly coincide with Table 6 in 8270SOP?
41. Table 6-1 references 8260, but "8240SOP" is apparently based on U.S.EPA methods 8240 and 624.
42. There are two possible ion traps for 8240SOP. Which one will be utilized for the Detroit Coke RA?
43. Tables 2A and 2B list Act 307 "ODLs", Operating Detection Limits. It should be explained in the QAPP how these particular criteria would apply to the Detroit Coke RA.
44. In a previous external audit conducted at the WWE Grand Rapids facility, it was determined that the 50 ppb level for acetone and other ketones in groundwater was an excessively high reporting limit. Perhaps for the Detroit Coke RA, this level could be reduced to 10 ppb.
45. For the 8240SOP, the lowest internal standard for initial calibration is significantly higher than some of the Act 307 or other health based limits which may be pertinent to the project. This issue awaits further discussion following elaboration/clarification of the project objectives.
46. Especially if high VOCs concentrations are anticipated to be found in soils, the methanol extraction procedure may yield more accurate data than would be possible using the heated purge and trap, although at the expense of higher detection limits. This matter should be considered during reformulation of the project objectives.

47. In section 11.2.3, it is stated that the standard deviation of the blank would be subtracted in the process of performing an MDL study. Subtraction of blank concentrations will not be allowed for the Detroit Coke investigational samples.
48. References to internal standards indicated in the fifth column of Table 1 of the 8270SOP are not specifically related to actual internal standards.
49. In Table 2 of 8270SOP, where is footnote 1?
50. Referring to section 4.0 of the 8270SOP, which GC/MS system will be used for the Detroit Coke RA, the Extrel or the Saturn?
51. Referring to section 8.1.5 of the 8270SOP, will tentatively identified compounds be reported for this investigation?
52. Referring to Earth Tech's A-12 SOP in Appendix B, bailers shouldn't be used for VOCs sampling.
53. The suitability and limitations of the 2 detectors specified in the Earth Tech SOP A-34 should be discussed in relation to the list of volatile target constituents which will be measured in the field.

JUN 10 1994

CERTIFIED MAIL: P 851 379 052
RETURN RECEIPT REQUESTED

HRP-8J

Mr. Paul Choinski
Detroit Coke Corporation
P.O. Box 09229
Detroit, Michigan 48209

Re: RFI QAPP
Detroit Coke Corporation
MID 099 114 704

Dear Mr. Choinski:

The final permit modifications issued to Detroit Coke which became effective on April 24, 1994, require corrective action at its facility located in Detroit, Michigan. Permit Condition G.1. of Attachment E stipulates that a RCRA Facility Investigation (RFI) Release Assessment Workplan be submitted within 120 days of the effective date of the permit. Therefore, please provide 3 copies the RFI Release Assessment Workplan on or before August 21, 1994.

An important part of the RFI Workplan is the Quality Assurance Project Plan (QAPP). Enclosed is a copy of Region 5's Model QAPP to serve as guidance for the formation of an acceptable plan. Carefully review the document and note that all of the requirements presented in the model are necessary for approval.

If you have any questions or concerns regarding the Model QAPP or the RFI process, please call me at (312) 886-0455.

Sincerely,

Greg Rudloff, Geologist
Michigan Section
RCRA Permitting Branch

Enclosures

cc: Steve Buda, MDNR
bcc: Allen Melcer

HRP-8J:Rudloff:NL:6-0455:F:\USER\SHARE\RUDLOFF\QAPPLET:6/2/94; 6/9/94; 6/10/94

CONCURRENCE REQUESTED FROM RPB			
SC/BR SECRTY		NL 6/10	
OTHER STAFF	RPB STAFF	RPB SECTION CHIEF	RPB BRANCH CHIEF
	SK 6/10		